

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

In re: ) Case No. 23-70001-M-11  
)  
M.A.R. DESIGNS & CONSTRUCTION, INC. )  
Debtor. ) Chapter 11

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTIONS SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**EXPEDITED RELIEF REQUESTED BY MARCH 6, 2023.**

EXPEDITED MOTION OF DEBTOR M.A.R. DESIGNS & CONSTRUCTION, INC.  
FOR LEAVE TO FILE SUPPLEMENTAL EXHIBIT LIST

TO THE HONORABLE JUDGE OF THE BANKRUPTCY COURT:

Debtor M.A.R. Designs & Construction, Inc. respectfully moves the Court for leave to file a supplemental exhibit list, Attachment 1, to this motion to supplement E.C.F. 97. The supplemental exhibit list lists an *amended* declaration by the proposed special counsel, Attachment 2, which is pertinent to the *Application for the Approval of the Employment of Frank J. Rodriguez as Special Counsel for the Debtor*. The *amended* declaration contains one added line to ensure that there is a written record of compliance with bankruptcy code 1195. Debtor proposes that the amended declaration amend E.C.F 87-2, the original declaration.

Counsel for Debtor has attempted to confer with the counsel for the parties in interest but probably because of the attempt to communicate is over the weekend, has not heard from anyone. A proposed form of order is attached.

On March 3, 2023, the Debtor served the supplemental exhibit list along with the amended declaration of Frank J. Rodriguez by email to all parties of notice.

This motion is being filed on an expedited basis so that the Court can consider it at the hearing on the application for approval of employment of special counsel, March 6, 2023 at 10:00 A.M.

WHEREFORE, PREMISES CONSIDERED, M.A.R. DESIGNS & CONSTRUCTION, INC. prays that this Court grant the *Expedited Motion of Debtor M.A.R. Designs & Construction, Inc. for Leave to File Supplemental Exhibit List*, and grant him any such further relief at law or under equity to which it has shown itself justly entitled to receive.

Date: March 5, 2023

Respectfully submitted,

Law Office of Antonio Martinez, Jr.

/s/ Antonio Martinez, Jr.

Antonio Martinez, Jr.

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Motion of Debtor M.A.R. Designs & Construction, Inc. for Leave to File Supplemental Exhibit List*, was served on the date that it was filed electronically on the parties listed below and on the parties listed in the Creditor Matrix filed in this case. Service was accomplished by the method and to the following as indicated: BY ELECTRONIC NOTICE, FACSIMILE OR REGULAR FIRST CLASS MAIL, POSTAGE PREPAID:

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